

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

MEDAPATI REDDY,)	
)	
Plaintiff,)	Civil Action No. 08 CV 321
)	
v.)	Judge Holderman
)	Magistrate Judge Cox
UBS AG,)	
)	
Defendant.)	

JOINT REPORT OF PARTIES' PLANNING MEETING

In accordance with this Court's Standing Order, Plaintiff Medapati Reddy and Defendant UBS AG submit the following Joint Report of Parties' Planning Meeting for the Court's consideration:

1. **Nature of Claims.** Plaintiff, a former employee of Defendant, claims he was unlawfully terminated in retaliation for allegedly making internal complaints regarding sexual harassment and age discrimination. Defendant denies Plaintiff's material allegations and maintains that Plaintiff was terminated for legitimate non-retaliatory reasons when his position was eliminated.

Planning Conference. Pursuant to Federal Rule of Civil Procedure 26(f), a meeting was held on May 1, 2008 at the offices of Katten Muchin Rosenman LLP and was attended by Plaintiff, who is proceeding *pro se*, and Kyle A. Petersen, counsel for Defendant.

2. **Initial Disclosures.** The parties will exchange Rule 26(a)(1) Disclosures on or before May 20, 2008.

3. **Fact Discovery.** All fact discovery shall be completed on or before August 4, 2008.

4. **Expert Discovery.** The parties will complete all expert discovery on or before September 3, 2008. Pursuant to Federal Rule of Civil Procedure 26(a)(2), the cut-off for designation of Plaintiff's trial expert is July 3, 2008, and for Defendant's trial expert is August 4, 2008. Unless otherwise stipulated, disclosure of experts will include a report fully in compliance with Federal Rule of Civil Procedure 26(a)(2)(B). Any motion challenging the qualifications of a designated expert must be made within 21 calendar days after the deposition of the expert or the close of discovery, whichever is earlier. If no motion is filed, the Court will deem challenges waived.

5. **Dispositive Motions.** All dispositive motions shall be filed by within sixty days following the close of discovery.

6. **Trial.** Plaintiff has made a jury demand. The parties anticipate they will be prepared to proceed, if necessary, with trial sixty days after the Court rules on dispositive motions. The parties estimate that a trial of this matter will take 4 days.

7. **Settlement.** The parties have engaged in informal settlement discussions but have been unable to reach agreement. Defendant is amenable to requesting a settlement conference to facilitate an early resolution but Plaintiff believes the possibility of settlement will enhanced by referral after discovery.

8. **Consent to Proceed Before Magistrate.** Plaintiff is willing to consent to having the entirety of this case reassigned to the Magistrate Judge but Defendant does not so consent.

Respectfully submitted,

MEDAPATI REDDY

UBS AG

/s/ Medapati Reddy
Plaintiff

/s/ Kyle A. Petersen
One of Its Attorneys

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CERTIFICATE OF SERVICE

I, one of Defendant's attorneys certify that on Monday, May 05, 2008, I electronically filed the foregoing ***Joint Report of Parties' Planning Meeting*** with the Clerk of the court using the CM/ECF system which will send notification of such filing to the following:

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/s/Kyle A. Petersen